

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____	
v.	:	DATE FILED: _____	
	:	VIOLATIONS:	18 U.S.C. § 371
STEVE MBAKOP	:		(conspiracy to
			commit wire fraud -
			1 count)

S U P E R S E D I N G I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about July 20, 2005, to on or about August 24, 2005, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

STEVE MBAKOP

conspired and agreed, together with another known to the grand jury, to commit an offense against the United States, that is, wire fraud, by devising and intending to devise a scheme to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1343.

MANNER AND MEANS

It was part of the conspiracy to defraud that:

2. Defendant STEVE MBAKOP and another known to the grand jury falsely represented that they would sell counterfeit U.S. currency in exchange for genuine U.S. currency on a two-for-one basis, when in fact, the defendant had no intention or ability to counterfeit United States currency.

3. In order to deceive individuals into believing that they had the ability to counterfeit U.S. currency, defendant STEVE MBAKOP and another known to the grand jury created a bogus counterfeiting process in which MBAKOP placed two white sheets of paper in foil, compressed them together with an authentic piece of U.S. currency, and applied powder, a chemical, iodine, and water. Defendant MBAKOP and another known to the grand jury falsely communicated to their victim that the ink from the U.S. currency would “bleed” onto the white sheets that were already inscribed with the markings similar to a true bill of U.S. currency. Defendant MBAKOP presented so called "converted" bills as proof that their counterfeiting process worked, when in fact, through sleight of hand, he simply provided genuine U.S. currency.

4. Defendant STEVE MBAKOP and another known to the grand jury told an undercover agent that to enable the defendants to manufacture \$80,000 U.S. currency, the undercover agent would have to give the defendants \$40,000 in cash. Defendant MBAKOP and another known to the grand jury falsely represented that the \$40,000 was necessary because the process could only be applied once on an authentic bill, and in order to keep producing the counterfeit bills, the undercover agent should deposit the counterfeit cash into his bank, and thereafter withdraw the deposited amount so the process could be repeated on the withdrawn funds. The defendant MBAKOP and another known to the grand jury further falsely represented that once the money was deposited, that this would be the first in a series of transactions between the undercover agent, the defendant, and another known to the grand jury.

OVERT ACTS

In furtherance of the conspiracy, defendant STEVE MBAKOP and another known to the grand jury committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about July 28, 2005, defendant STEVE MBAKOP and another known to the grand jury met with an undercover agent at Dave and Buster's restaurant, 325 North Delaware Avenue, Philadelphia, Pennsylvania. While in the presence of MBAKOP, the other individual known to the grand jury explained the process of how they were able to convert genuine U.S. currency into counterfeit U.S. currency.

2. On or about July 28, 2005, defendant STEVE MBAKOP, and another known to the grand jury met with the undercover agent in room 1034 at the Marriott Hotel in Philadelphia. While in the hotel room, MBAKOP took a genuine item of U.S. currency, that is, a twenty-dollar bill, and proceeded to use tin foil, powder, unknown chemicals, water, and pressure to create what he and another known to the grand jury claimed were two counterfeit twenty-dollar bills.

3. On or about August 23, 2005, another individual known to the grand jury spoke with the undercover agent by wireless telephone and told the agent that he needed \$40,000 in U.S. currency to create the \$80,000 in false currency. The individual further instructed the undercover agent to contact him when the agent arrived in Philadelphia.

4. On about August 24, 2005, another individual known to the grand jury spoke with the undercover agent over a wireless telephone and agreed to meet with the agent later that afternoon in the agent's hotel room in Philadelphia to complete the transaction.

5. On or about August 24, 2005, defendant STEVE MBAKOP and another known to the grand jury met with the undercover agent in room 324 at the Courtyard Marriott Hotel, 21 N. Juniper Street, Philadelphia, Pennsylvania. While in the hotel room, MBAKOP took a genuine item of U.S. currency, that is, a fifty-dollar bill, and proceeded to use tin foil, powder, unknown chemicals, water, and pressure to create what he and another known to the grand jury claimed was a counterfeit fifty-dollar bill.

6. On or about August 24, 2005, defendant STEVE MBAKOP and another individual known to the grand jury accepted \$3,000 in cash from the undercover agent as partial payment for the \$40,000 that the undercover agent agreed to pay defendant for the purchase of \$80,000 in counterfeit U.S. currency.

All in violation of Title 18, United States Code, Section 371.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney